

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN OF SOUTH DAKOTA

RICHARD HYLLAND,

Plaintiff,

vs.

RUSSELL FLAUM,

Defendant.

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CIV. 16-4060

AFFIDAVIT OF RICHARD HYLLAND

COMES NOW the Plaintiff, *Richard Hylland*, after being duly sworn on oath states as follows:

1. That I am the Plaintiff in the above referenced case and am a legal resident of the State of South Dakota.
2. That my wife (Mrs. Hylland) and I were married in the State of South Dakota on July 6, 1985.
3. That Defendant Flaum made 201 telephone calls to Mrs. Hylland in South Dakota during the period May 17, 2015 through July 10, 2015. Flaum's telephone number is (847) 224-0823. (Exhibit A)
4. That Defendant Flaum sent in excess of 35 e-mails to Mrs. Hylland in South Dakota during the period May 17, 2015 through July 10, 2015. I obtained these e-mails directly from Mrs. Hylland's family cell telephone. (Exhibit B)
5. That Defendant Flaum sent to Mrs. Hylland in South Dakota, gifts of t-shirts featuring an 'RF' type logo on the t-shirt. (Exhibit C)
6. That Defendant Flaum twice contacted Anne Hayden, a friend of Mrs. Hylland, in South Dakota in an attempt to endear Mrs. Hylland toward Flaum through her friends. (Exhibit D)


8. That Defendant Flaum arranged video-conference interaction with Mrs. Hylland in South Dakota; said FaceTime video interaction included in addition to Mrs. Hylland, Mrs. Hylland's friends (all South Dakota residents), Carmen Bauer, Ann Flynn-Crowe and Deb Waddell. (Exhibit F)

Dated this 21st day of June, 2016.


Richard Hylland, Plaintiff

STATE OF SOUTH DAKOTA)
:SS
COUNTY OF MINNEHAHA)

RICHARD HYLLAND, known to me (or satisfactorily proven) to be the person named in the foregoing instrument, personally appeared before me, a Notary Public, within and for the State and County aforesaid, and acknowledged that he freely and voluntarily executed the same for the purposes stated therein.


Notary Public, South Dakota
My Commission Expires: July 12, 2021
